

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

VASEK POSPISIL, NICHOLAS KYRGIOS,  
ANASTASIA RODIONOVA, NICOLE  
MELICHAR-MARTINEZ, SAISAI ZHENG,  
SORANA CÎRSTEA, JOHN-PATRICK  
SMITH, NOAH RUBIN, ALDILA SUTJIADI,  
VARVARA GRACHEVA, TENNYS  
SANDGREN, SACHIA VICKERY,  
NICOLAS ZANELLATO, and REILLY  
OPELKA, on behalf of themselves and all  
others similarly situated,

-and-

THE PROFESSIONAL TENNIS PLAYERS  
ASSOCIATION,

Plaintiffs,

v.

ATP TOUR, INC. and WTA TOUR, INC.,

Defendants.

Case No. 1:24-cv-00207-MMG

**ORAL ARGUMENT REQUESTED**

**DECLARATION OF BRADLEY I. RUSKIN IN SUPPORT OF ATP TOUR, INC.'S  
MOTION TO DISMISS, OR, IN THE ALTERNATIVE, TO SEVER CLAIMS AGAINST  
ATP UNDER F.R.C.P. 21, AND TRANSFER PURSUANT TO 28 U.S.C. § 1404(A)**

I, Bradley I. Ruskin, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1) I am an attorney at law admitted to practice in the State of New York and before this Court. I am a partner with the law firm Proskauer Rose LLP, counsel for Defendant ATP Tour, Inc. I submit this declaration in support of Defendant ATP Tour, Inc.'s Motion to Dismiss, Or, In the Alternative, To Sever Claims Against ATP Under F.R.C.P. 21, and Transfer Pursuant to § 28 U.S.C. 1404(A).

2) Attached as **Exhibit A** is a true and correct copy of the Sixth Amended and Restated Bylaws of ATP Tour, Inc. as of September 24, 2024.

3) Attached as **Exhibit B** is a true and correct copy of excerpts of the May 20, 2025 ATP Official Rulebook.

4) Attached as **Exhibit C** is a true and correct copy of the Eighth Amended and Restated Certificate of Incorporation of ATP Tour, Inc. filed October 1, 2024.

5) Attached as **Exhibit D** is a true and correct copy of the March 21, 2025 article “Inside the PTPA Lawsuit to Upend Tennis: An in-depth interview with PTPA Executive Director Ahmad Nassar about the effort to break through the powers-that-be in professional tennis,” by Ben Rothenberg.

6) Attached as **Exhibit E** is a true and correct copy of excerpts from the 2025 Official WTA Tour, Inc. Rulebook (available online at <https://www.wtatennis.com/wta-rules>).

Dated: July 31, 2025

New York, New York

/s/ Bradley I. Ruskin  
Bradley I. Ruskin